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Hon. Robert S. Lasnik

Attorneys for Plaintiffs Larry Pifer and Pamela Pifer

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LARRY PIFER and PAMELA PIFER,
Husband and Wife,

Plaintiffs,

vs.

BANK OF AMERICA, N.A., a national
association, SPECIALIZED LOAN
SERVICING LLC, a foreign corporation, NEW
PENN FINANCIAL, LLC dba SHELLPOINT
MORTGAGE SERVICING, a foreign
corporation, and THE BANK OF NEW YORK
AS TRUSTEE FOR THE
CERTIFICATEHOLDERS OF THE CWABS,
INC., ASSET-BACKED CERTIFICATES,
SERIES 2007-8, a national association.

Defendants.

CASE: 18-cv-606-RSL

STIPULATION AND ~~PROPOSED~~
ORDER FOR CONTINUANCE OF
THE INITIAL SCHEDULING DATES

EX PARTE

WITHOUT ORAL ARGUMENT

STIPULATION AND ~~PROPOSED~~ ORDER FOR CONTINUANCE OF THE INITIAL
SCHEDULING DATES

I. INTRODUCTION

Plaintiffs LARRY PIFER and PAMELA PIFER ("Plaintiff") and Defendants Bank of
America, N.A., Specialized Loan Servicing LLC, New Penn Financial, LLC dba Shellpoint
Mortgage Servicing, and the Bank of New York as Trustee for the Certificateholders of the
CWABS Inc., Asset-Backed Certificates Series 2007-8, hereby respectfully submit this Stipulation

STIPULATION AND ~~PROPOSED~~ ORDER FOR
CONTINUANCE OF THE INITIAL SCHEDULING
DATES - 1
NO. 2:18-cv-00606-RSL

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and Proposed Order for Continuance of the Initial Scheduling Dates for the good cause stated herein.

II. BACKGROUND

Plaintiff filed suit against Defendants in the United States District Court for the Western District of Washington on or about April 25, 2018. Dkt. No. 1. Plaintiff filed an amended Complaint on April 27, 2018. Dkt. No. 3 and Dkt. No. 21. The Complaint relates to allegations surrounding the foreclosure and servicing of Plaintiff's mortgage loan on real property located in Snohomish County, Washington.

Plaintiffs and Defendants New Penn Financial, LLC dba Shellpoint Mortgage Servicing ("Shellpoint"), Bank of New York ("BONY"), and Specialized Loan Servicing, LLC ("SLS") stipulated to a June 28, 2018 deadline to Answer the Amended Complaint.

Defendant Bank of America filed a Motion to Dismiss on May 22, 2018. Dkt. No. 20.

This is the first requested continuance of the initial scheduling dates.

The undersigned parties seek an Order for Continuance of the Initial Scheduling Dates because of the pending Motion to Dismiss filed by defendant Bank of America and the Stipulation authorizing Shellpoint, BONY, and SLS to answer the Amended Complaint by June 28, 2018.

III. STIPULATION

It is proposed that the current initial scheduling deadlines be extended sixty (60) days as detailed below:

Action	Current Deadline	New Deadline
Deadline for FRCP 26(f) Conference:	May 23, 2018	On or around July 23, 2018
Initial Disclosures Pursuant to FRCP 26(a)(1)	May 30, 2018	July 30, 2018
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and LCR 26(f):	June 6, 2018	August 6, 2018

STIPULATION AND ~~PROPOSED~~ ORDER FOR
CONTINUANCE OF THE INITIAL SCHEDULING
DATES - 2
NO. 2:18-cv-00606-RSL

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1 DATED: June 19, 2018

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3 HOLLAND & KNIGHT LLP

BARRAZA LAW, PLLC

4 /s/ David S. Elkanich per email authorization

/s/ Vicente Omar Barraza

5 David J. Elkanich, Esq., WSBA No. 35956

Vicente Omar Barraza, Esq., WSBA # 43589

6 Nellie Q. Barnard, Esq., WSBA No. 50587

Attorneys for Plaintiff

7 *Of Attorneys for Attorneys for*

8 *Specialized Loan Servicing LLC, New*

9 *Penn Financial, LLC dba Shellpoint*

10 *Mortgage Servicing, and The Bank of*

11 *New York as Trustee for the*

12 *Certificateholders of the CWABS, Inc.,*

13 *Asset-Backed Certificates, Series 2007-8*

14 WITHERSPOON · KELLEY

15 /s/ Michael J. Kapaun per email authorization

16 Michael J. Kapaun, Esq., WSBA # 36864

17 Steven J. Dixon, Esq., WSBA 38101

18 *Attorneys for Defendant Bank of America, N.A.*

19 It is so ordered.

20 DATED: June 20, 2018

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HONORABLE ROBERT S. LASNIK
United States District Court Judge for the
Western District of Washington

STIPULATION AND ~~PROPOSED~~ ORDER FOR
CONTINUANCE OF THE INITIAL SCHEDULING
DATES - 3
NO. 2:18-cv-00606-RSL

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